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March 6, 2014

Hon. Sandra L. Townes  
United States Courthouse  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: United States v. Ahmed et.al.  
**including Mohamed Yusuf**  
Ind. 12 Cr 661(S1)(SLT)

Dear Judge Townes:

Jane Simkin Smith and I are the attorneys assigned to represent Mr. Yusuf in the above referenced matter. I write on behalf of all of the defendants in this case to inform Your Honor of the intent of counsel to exchange statements purportedly made by the defendants subsequent to their seizure.

Ali Yasin Ahmed, Madhi Hashi, and Mohamed Yusuf are charged with Conspiracy to Provide Material Support to a Foreign Terrorist Organization and Use of a Firearm. Subsequent to their seizure by law enforcement personnel each defendant purportedly made incriminating statements. Counsel for each defendant has been provided with a copy of the statement attributed to his/her client, but has not been provided with the statements attributed to the co-defendants. Counsel have conferred with one another and their respective clients and determined that, in order to adequately prepare for trial, they need to review statements the government claims his co-defendants made.

We therefore seek to exchange statements purportedly made by each of the defendants subsequent to their arrest. It is our belief that the exchange of these documents does not violate the protective

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order signed by Your Honor on April 30, 2013. However, we write in an excess of caution to ensure that our belief is consistent with your understanding of the restrictions imposed by the protective order. I have conferred with the AUSA Seth Ducharme who informs me that the government takes no position on this application.

If you have any questions regarding this application please contact my office.

Respectfully submitted,

A handwritten signature in blue ink, appearing to be "David Stern", is written over the typed name. The signature is stylized with a large, sweeping initial "D" and a series of vertical strokes for the letters "AVID STERN".

David Stern